



February 6, 2025

Via ECF

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Hon. Philip M. Halpern, U.S. District Judge
U.S. District Court for the
Southern District of New York
Charles L. Brieany, Jr., U.S. Courthouse, Rm. 530
300 Quarropas St.
White Plains, New York 10601

RE: Second Letter Motion for Extension of Time, *Chun-Ko Chang v. Shen Yun Performing Arts, Inc., et al.*, Cause No. 7:24-cv-08980-PMH.

Dear Judge Halpern:

The undersigned has recently been retained to serve as counsel for Defendants Shen Yun Performing Arts, Inc.; Fei Tian College; Fei Tian Academy of the Arts; Dragon Springs Buddhist Inc.; Shujia Gong a/k/a Tianliang Zhang, Hongzhi Li, and Rui Li (the “Shen Yun Defendants”) in the above-captioned matter. I respectfully request an extension of time of 30 days for my clients to answer or otherwise respond to Plaintiff’s complaint (to March 21, 2025). This is the Shen Yun Defendants’ second collective request for an extension, as the Court previously granted continuances to the Shen Yun Defendants from January 10, 2025, to February 19, 2025. ECF Nos. 26, 27, and 32.

The Shen Yun Defendants initially engaged the firms of Cuddy & Feder and Stevenson & Marino LLP to represent them in this matter. Counsel from those firms are withdrawing their appearances. Butterfield & Patterson, PLLC, along with co-counsel Steven Schneebaum and Terri Marsh, was retained to serve as counsel on February 3. All of us have now been admitted to the Bar of this Court *pro hac vice*.

The Complaint is complex factually and legally, asserting eleven causes of action and spanning some 65 pages. Under the current deadline, undersigned counsel would have just over a week to prepare a response and, if appropriate, to initiate the first set of pre-motion letters for a motion to dismiss under the Court's individual practices. This request for an additional extension of 30 days would allow me and my co-counsel to devise a litigation strategy and to evaluate and respond to Plaintiff's allegations in a professional and competent manner.

Plaintiff's counsel has advised that their client is opposed to any extension beyond March 7 because Plaintiff's counsel previously negotiated a schedule with Shen Yun Defendants' prior counsel for a 40-day extension with a response due February 19, 2025, and our new request for an additional 30-day extension is not justified by the circumstances.

I therefore respectfully request that the Court grant an extension of time to respond to Plaintiff's complaint to March 21, 2025. We thank Your Honor for your consideration of this request.

Respectfully submitted,

/s/ Justin E. Butterfield

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cc: All counsel of record (via ECF)